

C. Genevieve Jenkins (SBN 271128)
cgjenkins@excelsislaw.com
Zainah Alfi (SBN 304164)
zalfi@excelsislaw.com
EXCELSIS LAW, P.C.
4405 Riverside Drive, Ste 206
Los Angeles, CA 91505
Telephone: 213-340-0300
Facsimile: 213-340-0200

Attorneys for Plaintiff
TAMARA GEIST

JAMES T. CONLEY (SBN 224174)
james.conley@ogletree.com
MICHELE J. BONGIOVANNI (SBN 309884)
michele.bongiovanni@ogletree.com
SANDRA BENLEVY (SBN 211568)
sandra.benlevy@ogletree.com
OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
400 Capitol Mall, Suite 2800
Sacramento, CA 95814
Telephone: 916-840-3150
Facsimile: 916-840-3159

Attorneys for Defendant
WAL-MART ASSOCIATES, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

TAMARA GEIST, an individual,

Plaintiff,

vs.

WAL-MART ASSOCIATES, INC., a Delaware
Corporation; and DOES 1 through 50, inclusive,

Defendants.

Case No. 2:24-cv-01298-TLN-AC

**JOINT STIPULATION TO EXTEND
DISPOSITIVE MOTION DEADLINES;
ORDER**

Action Filed:
Trial Date:

May 6, 2024
None Set

1 Plaintiff TAMARA GEIST (“Plaintiff”) and Defendant WAL-MART ASSOCIATES, INC.
2 (“Defendant”) (collectively “the Parties”), by and through their counsel, hereby stipulate and agree
3 as follows:

4 **RECITALS AND JOINT STIPULATION**

5 WHEREAS, on May 15, 2025, the Parties engaged in private mediation with Jean Hyams, at
6 which time they were unable to reach settlement;

7 WHEREAS, on August 7, 2024, the Parties filed a Joint Rule 26(f) Report in which they
8 agreed that the last day to file dispositive motions would be December 1, 2025;

9 WHEREAS, throughout the Fall of 2025 the parties completed all outstanding discovery and
10 discovery is now closed;

11 WHEREAS, the Parties have acted diligently to litigate and prepare this case for trial in an
12 efficient and expeditious manner;

13 WHEREAS, the Parties have once again decided to engage in settlement negotiations, and
14 have scheduled mediation with Steve Amundson on December 29, 2025;

15 WHEREAS, the Parties have agreed to briefly stay motion practice (including the Party’s
16 dispositive motion(s) and the Plaintiff’s motion(s) to compel related to Defendant’s supplemental
17 document production) in order to preserve resources and reduce unnecessary costs to the Parties
18 while focusing on a possible resolution of this case;

19 WHEREAS, good cause exists for a short extension of the dispositive motion and discovery
20 motion deadlines, to allow all Parties to participate in mediation, without prejudice to their ability to
21 prepare any dispositive motions;

22 WHEREAS, this request is made in good faith and not for the purpose of delay, and the
23 requested extension will not prejudice either party;

24 NOW THEREFORE, IT IS HEREBY STIPULATED AND REQUESTED, by and between
25 Plaintiff and Defendant, through their respective counsel, that the Court issue an order extending
26 Plaintiff’s deadline to meet and confer with Defendant and request an informal discovery conference
27 from November 25, 2025 to January 12, 2026.

28 ///

NOW THEREFORE, IT IS HEREBY STIPULATED AND REQUESTED, by and between Plaintiff and Defendant, through their respective counsel, that the Court issue an order extending the dispositive motion filing deadline by from December 1, 2025, to February 27, 2026. This extension of time will allow for the consideration of a mediator's proposal and/or follow-up settlement discussions without the incursion of unnecessary fees that could frustrate settlement efforts.

IT IS SO STIPULATED.

DATED: November 12, 2025

EXCELSIS LAW, P.C.

By: /s/ Zainah Alfi
C. Genevieve Jenkins
Zainah Alfi

Attorneys for Plaintiff TAMARA GEIST

DATED: November 12, 2025

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

By: /s/ James T. Conley
James T. Conley
Michele J. Bongiovanni
Sandra Benlevy

Attorneys for Defendant
WAL-MART ASSOCIATES, INC.

SIGNATURE ATTESTATION

I attest that I have obtained concurrence in the filing of this document from the other signatories in compliance with Local Rule 131(e).

Date: November 12, 2025

By: /s/ James T. Conley
James T. Conley

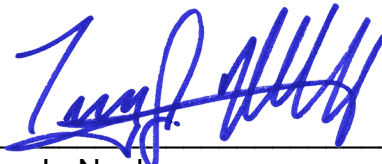
ORDER

The Court having read and considered the Parties' Joint Stipulation to Extend Dispositive Motion Deadlines, and good cause appearing:

IT IS HEREBY ORDERED that the Parties' last day to file dispositive motions shall be extended from December 1, 2025, to February 27, 2026.

IT IS SO ORDERED.

Dated: November 12, 2025



Troy L. Nunley
Chief United States District Judge